

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
JUN 23 2015	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

IN RE: FIRST NATIONAL
COLLECTION BUREAU, INC
TELEPHONE CONSUMER
PROTECTION ACT (TCPA)
LITIGATION

MDL: 2527

CASE NO. 2:14-cv-00557-
KJD-CWH (Base File)

THIS DOCUMENT RELATES TO:

Case No.: 2:13-CV-01206 (Neal v.
First National Collection Bureau, Inc.)
Case No.: 13-CV-01303 (Beell v.
First National Collection Bureau, Inc.)
Case No.: 13-cv-1515 (Hunter v.
First National Collection Bureau, Inc.)

STIPULATION TO DIMISS
INDIVIDUAL CLAIMS WITH
PREJUDICE AND CLASS CLAIMS
WITHOUT PREJUDICE

(Proposed Order Attached)

Pursuant to Fed. R. Civ. Proc. 41(a)(1)(A)(ii), Plaintiffs, Claudette Neal, Jessica Beell, and Nanette Hunter, and Defendant, First National Collection Bureau, Inc. (individually, a "Party" and collectively, "the Parties") stipulate to dismiss the individual claims with prejudice and the class claims without prejudice, with each Party to bear her or its own attorney's fees, costs and expenses in connection with both the MDL Action and the related individual Actions. A proposed Order is submitted concurrently herewith for the Court's convenience.

Respectfully Submitted,

/s/Todd M. Friedman

TODD M. FRIEDMAN, ESQ.
LAW OFFICES OF TODD M. FRIEDMAN, P.C.
Counsel for Claudette Neal
324 S. Beverly Drive, Suite 725
Beverly Hills, CA 90212
Tel: (877) 206-4741
Fax: (866) 633-0228
tfriedman@attorneysforconsumers.com

/s/Gary J. Lorch

GARY J. LORCH, ESQ.
GORDON & REES, LLP
*Counsel for First National
Collection Bureau, Inc.*
633 West Fifth Street, 52nd. Floor
Los Angeles, CA 90071
Tel: (213) 576-5000
Fax: (213) 680-4470
glorch@gordonrees.com



CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the below counsel of record:

Sayed Abbas Kazerounian
ak@kazlg.com
Matthew M. Loker
ml@kazlg.com
Kazerouni Law Group, APC
245 Fisher Avenue, Suite D1
Costa Mesa, CA 92626

Joshua B. Swigart
josh@westcostlitigation.com
Hyde & Swigart
2221 Camino Del Rio South, Suite 101
San Diego, CA 92108

Attorneys for Plaintiff, Claudette Neal

Douglas J. Champion
doug@djcampion.com
Law Offices of Douglas J. Champion, APC
409 Camino Del Rio South, Suite 303
San Diego, CA 92108

Daniel G. Shay
danielshay@sandiegobankruptcynow.com
Law Offices of Daniel G. Shay
409 Camino Del Rio South, Suite 303
San Diego, CA 92108

Ronald A. Marron
ron@consumersadvocate.com
Alexis M. Wood
alexis@consumersadvocate.com
Kas L. Gallucci

kas@consumersadvocate.com
Law Offices of Ronald A. Marron
651 Arroyo Drive
San Diego, CA 92103

Attorneys for Plaintiff, Nanette Hunter

Rafey S. Balabanian
rbalabanian@edelson.com
Christopher L. Dore
cdore@edelson.com
Benjamin H. Richman
brichman@edelson.com
Edelson PC
350 North LaSalle Street, Suite 1300
Chicago, IL 60654

Marc P. Cook
cnklawfirm@aol.com
Bailus Cook & Kelesis, Ltd.
400 S. 4th Street, Suite 300
Las Vegas, NV 86101

Attorneys for Plaintiff, Jessica Beell

Gary J. Lorch
glorch@gordonrees.com
Amy Maclear
amaclear@gordonrees.com
Gordon & Rees, LLP
275 Battery Street, Suite 2000
San Francisco, CA 94111

Issa Kalani Moe
moei@moss-barnett.com
Moss & Barnett P.A.
4800 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402

Stephanie J. Smith
sjsmith@gordonrees.com
Robert E. Schumacher
rschumacher@gordonrees.com
Gordon & Rees LLP
3770 Howard Hughes Parkway, Suite 100
Las Vegas, NV 89169

James Charles Kezele
Kevin R. Feazell
Cors & Bassett LLC
537 E. Pete Rose Way
Suite 400
Cincinnati, Ohio 45202

Rex Garner
rdg@morrislawgroup.com
Robert R. McCoy
rrm@morrislawgroup.com
Morris Law Group
900 Bank of America Plaza
300 S. Fourth Street
Las Vegas, NV 89101

Joan M. Borzcik
Gordon & Rees LLP
101 West Broadway
Suite 2000
San Diego, CA 92101

Attorneys for Defendant First National Collection Bureau, Inc.

/s/ Todd M. Friedman
Todd M. Friedman, Esq.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

IN RE: FIRST NATIONAL
COLLECTION BUREAU, INC
TELEPHONE CONSUMER
PROTECTION ACT (TCPA)
LITIGATION

MDL: 2527

CASE NO. 2:14-cv-00557-
KJD-CWH (Base File)

THIS DOCUMENT RELATES TO:
Case No.: 2:13-CV-01206 (Neal v.
First National Collection Bureau, Inc.)
Case No.: 13-CV-01303 (Beell v.
First National Collection Bureau, Inc.)
Case No.: 13-cv-1515 (Hunter v.
First National Collection Bureau, Inc.)

ORDER OF DIMISSAL OF
INDIVIDUAL CLAIMS WITH
PREJUDICE AND CLASS CLAIMS
WITHOUT PREJUDICE

Pursuant to the Parties' Stipulation of Dismissal of Individual Claims with prejudice and Class Claims without prejudice, the individual claims set forth in the above-referenced MDL Action and related Actions (*Neal v. First National Collection Bureau, Inc.* Case No. 2:14-cv-01206, *Beel v. First National Collection Bureau, Inc.*, Case No. 13-cv-01303-KJD-CWS, and *Hunter v. First National Collection Bureau, Inc.*, Case No. 13-cv-151-JLS-KSC, are hereby dismissed with prejudice.

Pursuant to the Parties' Stipulation of Dismissal of Individual Claims with prejudice and Class Claims without prejudice, the putative class claims set forth in the above-referenced MDL Action and related Actions (*Neal v. First National Collection Bureau, Inc.* Case No. 2:14-cv-01206, *Beel v. First National Collection Bureau, Inc.*, Case No. 13-cv-01303-KJD-CWS, and *Hunter v. First National Collection Bureau, Inc.*, Case No. 13-cv-151-JLS-KSC, are hereby dismissed without prejudice.



6/23/2015

Judge Kent J. Dawson